IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

EILYN MARIA MARTINEZ SANCHEZ

DEBTOR(S)

CASE NUMBER: 07-00167 (SEK)

CHAPTER 13 ASSET CASE)

DEBTOR'S MOTION UNDER SECTION 1329 OF THE BANKRUPTCY CODE

THE HONORABLE COURT:

COMES NOW, Debtor (s) through the undersigned attorney and respectfully ALLEGES and PRAYS:

1. That debtor (s) filed and circulated a MODIFIED PLAN to all parties in interest.

2. That the modification is based in that the Debtor (s) wants to amend their plan in order to:

a. Amend in order to include lump sum payment from adversary proceeding.

3. Debtor (s) amend plan call twenty seven(27) payment of $500.00, five(5) payments of $0.00 and twenty eight (28) payments of $600.00, and one (1) lump sum payment of $2,334.00 for a total base of $32,634.00 dollars with a provision for the payment of pre and arrears to Banco Popular de Puerto Rico, account ending number-10000 and pay in full the motor vehicle to Banco Bilvao Vizcaya.

4. Debtor (s) are still is interested in continuing with the bankruptcy procedures and proof if the amendment of the plan in order to comply with the disbursement schedules.

WHEREFORE, Debtor (s) respectfully request from this Honorable Court to accept this motion and grant debtor (s) the opportunity to modify the confirmed plan according to 11 US 1329 and provide any other remedy it may deem appropriate.

NOTICE

"Parties in interest are notified the have twenty one (21) days to reject a proposed modification of a plan and request a hearing. If no opposition is filed within the prescribed period of time, the Court will enter and order granting the motion upon the filing of a certificated of service by the movant that adequate notice was given. Should and apposition be timely filed. The Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejections shall be denied".

In San Juan, Puerto Rico, this 16th, day of September, 2010.

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee **Alejandro Oliveras, Esq.**, US Trustee **Monsita Lecaroz Arribas** and to all those who in this case have registered for receipt of notice by electronic mail and I hereby certify that I have mailed by regular mail to all creditors listed on the attached Master Address List.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega
MARILYN VALDES ORTEGA
USDC PR 214711
P.O. Box 19559
San Juan, PR 00919-5596
Tel. (787) 758-4400
Fax. (787) 763-0144
E-mail valdeslaw@prtc.net

United States Bankruptcy Court
District of Puerto Rico

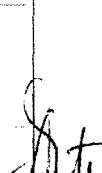IN RE: Case No. **07-00167 SEK**

MARTINEZ SANCHEZ, EILYN MARIA   Chapter **13**
Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☑ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ ☑ AMENDED PLAN DATED: **9/15/2010**
☐ PRE ☐ POST-CONFIRMATION   Filed by: ☑ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE	II. DISBURSEMENT SCHEDULE
$ **500.00** x **27** = $ **13,500.00**	A. ADEQUATE PROTECTION PAYMENTS OR $ _____
$ **0.00** x **5** = $ **0.00**	B. SECURED CLAIMS:
$ **600.00** x **28** = $ **16,800.00**	☐ Debtor represents no secured claims.
$ ____ x ____ = $ ____	☑ Creditors having secured claims will retain their liens and shall be paid as
$ ____ x ____ = $ ____	follows:
	1. ☑ Trustee pays secured ARREARS:
TOTAL: $ **30,300.00**	Cr. **BANCO POPULAR D** Cr. _____ Cr. _____
	# **071010010000** # _____ # _____
Additional Payments:	$ **8,605.74** $ _____ $ _____
$ **2,334.00** to be paid as a LUMP SUM	2. ☑ Trustee pays IN FULL Secured Claims:
within **46 months** with proceeds to come from:	Cr. **BANCO BILBAO VIZ** Cr. _____ Cr. _____
	# **9604744361** # _____ # _____
☐ Sale of Property identified as follows:	$ **6,865.33** $ _____ $ _____
	3. ☐ Trustee pays VALUE OF COLLATERAL:
	Cr. _____ Cr. _____ Cr. _____
	# _____ # _____ # _____
	$ _____ $ _____ $ _____
☑ Other:	4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:
ADVERSARY PAYMENT	
	5. ☐ Other:
Periodic Payments to be made other than, and in	
addition to the above:	6. ☑ Debtor otherwise maintains regular payments directly to:
$ ____ x ____ = $ ____	**BANCO POPULAR D**
	C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
PROPOSED BASE: $ **32,634.00**	11 U.S.C. § 507 and § 1322(a)(2)
	D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.
III. ATTORNEY'S FEES	1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: ____
(Treated as § 507 Priorities)	☐ Paid 100% / ☐ Other: ____
	Cr. _____ Cr. _____ Cr. _____
Outstanding balance as per Rule 2016(b) Fee	# _____ # _____ # _____
Disclosure Statement: $ **2,850.00**	$ _____ $ _____ $ _____
	2. Unsecured Claims otherwise receive PRO-RATA disbursements.
	OTHER PROVISIONS: *(Executory contracts; payment of interest to unsecureds, etc.)*
	See Continuation Sheet
Signed: **/s/ EILYN M MARTINEZ SANCHEZ**	
Debtor	
Joint Debtor	

Attorney for Debtor Marilyn Valdes Ortega Law Offices   Phone: **(787) 758-4400**

AMENDED CHAPTER 13 PAYMENT PLAN

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

TRUSTEE TO PAY ATORNEY'S FEES BEFORE ANY SECURED OR PRIORITY CREDITOR.

ADEQUATE PROTECTION PAYMENT TO BE PAID TO BBVA IN THE AMOUNT OF $150.00 UNTIL CONFIRMATION OF THE PLAN.

INSURANCE TO BBVA THROUGH UNIVERSAL AT THE END OF SALES CONTRACT IN THE APROXIMATE AMOUNT OF $416.00

BBVA; PO BOX 364745 SAN JUAN, PR 00936-4745

DEBTOR SURRENDER SAVINGS AND SHARES TO VAPR FEDERAL CREDIT UNION

VAPR FEDERAL CREDIT UNION: PO BOX 33017 VETERANS PLAZA STATION SAN JUAN PR 00933-0017

MARTINEZ SANCHEZ, EILYN MARIA
COND. VILLAS DE PARKVILLE I
AF-PH2 BOX 30
GUAYNABO, PR 00969

FIRST USA
CARD MEMBER SERVICE
PO BOX 94014
PALATINE, IL 60094-4014

Marilyn Valdes Ortega Law Offices
PO BOX 19596
SAN JUAN, PR 00919-5596

GE MONEY BANK
PO BOX 960001
ORLANDO, FL 32896-0001

AMERICAN EXPRESS
P.O. BOX 1270
NEWARK, NJ 07101-1270

HOME DEPOT
P.O. BOX 630268
DES MOINES, IA 50364-9100

BANCO BILBAO VIZCAYA
P.O. BOX 364745
SAN JUAN, PR 00936-4745

INTERNAL REVENUE SERVICE
MERCANTIL PLAZA BLDG
ROOM 1014
SAN JUAN, PR 00918

BANCO POPULAR DE PUERTO RICO
P.O. BOX 362708
SAN JUAN, PR 00936-2708

MUEBLERIAS BERRIOS
PO BOX 674
CIDRA, PR 00739

CHASE
CARD MEMBER SERVICE
PO BOX 94014
PALATINE, IL 60094-4014

OLD NAVY
PO BOX 530942
ATLANTA, GA 30353-0942

CRIM
372 AVE. ROTARIO
SUITE 110 B
ARECIBO, PR 00612

SAM'S CLUB
P.O. BOX 530942
ATLANTA, GA 30353-0942

DEPARTAMENTO DE HACIENDA
PO BOX 9024140
OFICINA 424 B
SAN JUAN, PR 00902

SEARS CREDIT CARDS
PO BOX 183114
COLUMBUS, OH 43218-3114

DEPARTAMENTO DEL TRABAJO
AVE. MUÑOZ RIVERA 505
HATO REY, PR 00918

VAPR FEDERAL CREDIT UNION
PO BOX 33017
VETERAN PLAZA STATION
SAN JUAN, PR 00933-0017

FEDERAL LITIGATION DEPT OF JUSTICE
PO BOX 9020192
SAN JUAN, PR 00902-0192

WFNNB-MARIANNE
PO BOX 659705
SAN ANTONIO, TX 78265-9705